

BROWN, LLC  
Edmund C. Celiesius  
111 Town Square Place, Suite 400  
Jersey City, NJ 07310  
T: (201) 630-0000  
ed.celiesius@jtblawgroup.com  
*Lead Counsel for Plaintiff*  
*(Additional counsel appear on signature page)*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

FREDDIE PEARSON, and LEA ANN  
DAILEY, individually, and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

INTOUCHCX SOLUTIONS, INC.

Defendant.

Case No.: 2:23-CV-01888-APG-MDC

STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFFS TO  
RESPOND TO DEFENDANT'S  
MOTION TO DISMISS AND FOR  
DEFENDANT TO REPLY

On December 20, 2023, Plaintiffs FREDDIE PEARSON and LEA ANN DAILEY ("Plaintiffs") filed a their first amended putative and collective action complaint in the United States District Court, District of Nevada (ECF No. 15);

On January 19, 2024, Defendant INTOUCHCX SOLUTIONS, INC. filed its Motion to Dismiss Collective Action and Class Complaint with Jury Demand (ECF No. 23);

Pursuant to LR 7-2(b), Plaintiffs currently have until February 2, 2024 to file their response to Defendant's Motion to Dismiss, and Defendant has until February 9, 2024, to file its reply brief in support thereof;

On January 22, 2024, counsel for Plaintiffs and Defendant conferred regarding a fourteen (14) day extension of Plaintiffs' deadline to respond to Defendant's Motion to Dismiss, as well as a seven (7) day extension of Defendant's deadline to file a reply brief in support thereof, and counsel for Defendant advised they consent to said extensions. The reason for the extensions are not for delay;

**STIPULATION**

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between  
Plaintiffs and Defendant, through their respective undersigned counsel of record, that:

1. Plaintiffs will have until February 16, 2024, to file their response to Defendant's  
Motion to Dismiss, an extension of fourteen (14) days;

2. Defendant will have until March 1, 2024, to file its reply brief in support of its  
Motion to Dismiss, an extension of seven (7) days;

IT IS SO STIPULATED.

Dated: January 25, 2024

**BROWN, LLC**

/s/ Edmund Celiesius  
Edmund C. Celiesius (PHV)  
Nicholas Conlon (PHV)  
111 Town Square Place, Suite 400  
Jersey City, NJ 07310  
T: (201) 630-0000  
ed.celiesius@jtblawgroup.com  
nicholasconlon@jtblawgroup.com

*Lead Counsel for Plaintiffs*

Roger Wenthe  
**ROGER WENTHE, PLLC**  
Nevada Bar No. 8920  
2831 St. Rose Pkwy. #200  
Henderson, NV 89052  
T: (702) 971-0541  
roger.wenthe@gmail.com

*Local Counsel for Plaintiffs*

**FISHER & PHILLIPS LLP**

/s/ Jeffrey McClelland  
Jeffrey H. McClelland (PHV)  
1125 17th Street, Suite 2400  
Denver, CO 80202  
jmccllland@fisherphillips.com

*Counsel for Defendant*

E. Anne Hanson  
**FISHER & PHILLIPS LLP**  
300 S. Fourth Street, Suite 1500  
Las Vegas, NV 89101  
ehanson@fisherphillips.com

*Counsel for Defendant*

IT IS SO ORDERED:

Dated: January 26, 2024

///

///

  
\_\_\_\_\_  
ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE